

EXHIBIT P

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both individually
and as Legal Guardian of Shane Allen
Loveland, and JACOB SUMMERS,

Plaintiffs,

v.

THE GOODYEAR TIRE & RUBBER
COMPANY,

Defendant.

Case No. 8:18CV127

**DECLARATION OF EDWARD S. BOTT,
JR. IN SUPPORT OF THE GOODYEAR
TIRE & RUBBER COMPANY'S
BRIEF IN OPPOSITION TO
PLAINTIFFS' MOTION FOR SUMMARY
JUDGMENT
AND
BRIEF IN OPPOSITION TO
PLAINTIFFS' MOTION TO APPLY
OHIO LAW REGARDING PUNITIVE
DAMAGES**

I, Edward S. Bott, Jr., declare as follows:

1. My name is Edward S. Bott Jr. I understand the nature of this oath, and I am competent to testify to the matters stated in this Declaration. This testimony is based on my own personal knowledge, and the facts stated herein are true and correct.

2. True and accurate copies of each of the documents identified as exhibits in The Goodyear Tire & Rubber Company's Brief in Opposition to Plaintiffs' Motion for Summary Judgment and Brief in Opposition to Plaintiffs' Motion to Apply Ohio Law Regarding Punitive Damages are attached to the Index in Support of The Goodyear Tire & Rubber Company's Brief in Opposition to Plaintiffs' Motion for Summary Judgment and Brief in Opposition to Plaintiffs' Motion to Apply Ohio Law Regarding Punitive Damages.

Pursuant to 28 U.S.C. SECTION 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 3rd day of September, 2019, in St. Louis, Missouri.

A handwritten signature in black ink, appearing to read "Ed Bott", with a long horizontal flourish extending to the right.

EDWARD S. BOTT, JR.